

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

United States Courts
Southern District of Texas
FILED

AUG 22 2018

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

2

VS.

§

CRIMINAL NO.

ANDRES MORALES

§

ROBERT BERRY

ALEC CAMACHO

§

MARCUS STEVENSON

18CR 496

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(Engaging in the Business without a License - Firearms)

From on or about early 2017 to early 2018, in the Southern District of Texas,
Defendant,

ANDRES MORALES,

not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms.

In violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

COUNT TWO

(Aiding and Abetting the Exportation of Firearms)

From on or about early 2017 to early 2018, in the Southern District of Texas,
Defendant,

ANDRES MORALES.

did aid and abet others known and unknown to the grand jury to facilitate the sale of articles and objects designated as munitions on the United States Munitions List, that is:

- (i) approximately ten (10) to fifteen (15) Barrett .50 caliber rifles; and
- (ii) ten (10) or more AK-47 assault-style rifles

prior to exportation, knowing said firearms to be intended for exportation from the United States and into Mexico, contrary to Title 22, Code of Federal Regulations, Sections 121.1, 123.1 and 127.1, a law or regulation of the United States.

In violation of Title 18, United States Code, Sections 554 and 2.

COUNT THREE
(Explosive Materials—Transport by Non-Licensee)

On or about April 17, 2018, in the Southern District of Texas, Defendant,

ROBERT BERRY,

not being a licensee under the provisions of Chapter 40 of Title 18 of the United States Code, knowingly transported and shipped, and caused to be transported and shipped, explosive materials, namely, a 40 mm projectile grenade.

In violation of Title 18, United States Code, Sections 842(a)(3)(A) and 844(a).

COUNT FOUR
(Straw Purchase of Firearms)

On or about October 18, 2017, in the Southern District of Texas, Defendant,

ALEC CAMACHO

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Red Beard Tactical, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that Defendant, **ALEC CAMACHO**, did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of two (2) Barrett .50 caliber

rifles, Model 82A1, serial numbers AA006199 and AA006271, whereas in truth and in fact, he was acquiring the firearms on behalf of another person.

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT FIVE
(Straw Purchase of a Firearm)

On or about August 15, 2017, in the Southern District of Texas, Defendant,

MARCUS STEVENSON

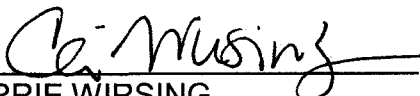
knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Texas Shooters Supply, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that Defendant, **MARCUS STEVENSON**, did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of a Barrett .50 caliber rifle, Model 82A1, serial number AA005813, whereas in truth and in fact, he was acquiring the firearm on behalf of another person.

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

A TRUE BILL: ~~_____~~ ~~_____~~

(Original Signature on File

RYAN K. PARTICK
UNITED STATES ATTORNEY


CARRIE WIRSING
Assistant United States Attorney